

Fullagar, Jill

From: URBANOWICZ Karla <URBANOWICZ.Karla@deq.state.or.us>
Sent: Friday, December 19, 2014 9:37 AM
To: Fullagar, Jill
Subject: FW: Biocriteria Assessments with low counts
Attachments: BiocriteriaLowCount_DontAddTo303d.xlsx; Dealing with Low Counts_SH_4.8.14.xlsx

Hi Jill –

I don't know if Gretchen forwarded this to you, but I would like to talk over some ideas about ways to address some questionable biocriteria listings.

I'll try to give you a call today.

Thanks
Karla

From: URBANOWICZ Karla
Sent: Wednesday, December 17, 2014 6:35 PM
To: 'Hayslip.Gretchen@epamail.epa.gov'
Cc: HUBLER Shannon; BRYANT Peter
Subject: Biocriteria Assessments with low counts

Hi Gretchen –

We have been fielding some questions about a new 303(d) listing for Biocriteria we added to the 2012 303d list for North For Whychus Creek (Record 23601):

Deschutes	North Fork	Biological	Year	Biocriteria: Waters	Aquatic	Cat 5:	Status	Waters
Upper	Whychus Creek	Criteria	Round	of the state must	life	Water	modification	identified with
Deschutes	(formerly North			be of sufficient		quality	- Added to	impaired
17070301	Fork Squaw			quality to support		limited,	303(d) list	biological
	Creek)			aquatic species		303(d)		conditions
	1216740441658			without		list,		reclassified as
23601	0 to 5.3			detrimental		TMDL		Cat 5: Water
	5.3			changes in the		needed		quality limited,
				resident biological				303(d) list.
				communities.				
								2010 Data:
								LASAR 35633
								River Mile 0.02
								FROM
								8/12/2000 To
								8/12/2000 1 out
								of 1 (100%)
								samples outside
								WCCP regional
								criteria.
								Previous Status:
								Cat 3C:
								Impairing
								pollutant

unknown
Previous Action:
Added to
database
Previous
Assessment
Year: 2010

This new listing was one of 26 assessments for biocriteria that DEQ reclassified in order to eliminate use of Category 3C: Impairing pollutant unknown that was disapproved with the 2010 303(d) list.

On reviewing this assessment to answer the question from the US Forest Service, we found that the macroinvertebrate sampling data on that creek had been reviewed by Shannon Hubler in April 2014, and found to have low bug counts. To finalize the 2012 303(d) list, DEQ had reviewed the data used for the 2010 assessments and determined that samples with counts less than 150 organisms were not full valid samples and were not sufficient to determine impairment, but did indicate a potential concern. We had intended to correct the 2010 findings by delisting waters that had been found to be impaired based on samples with low bug counts. However, it looks like the intended assessments were not completed, and we only de-listed two biocriteria records. There may be on the order of 50 other listings that were based on questionable sample data. These include 10 assessments out of the 26 records that were re-classified and added to the 2012 303(d) list, but on review had low bug counts and are more properly classified as Insufficient data or potential concern, rather than impaired.

At this stage in the 2012 IR process, is there anything that can be done to correct our oversight?

One option is that the EPA not approve the addition of the 10 waters reclassified from Cat 3c to Cat 5. Another option would be for EPA to de-list the other waters with low bug counts that had been added to the 2010 303(d) list with EPA's action.

For your information, I attached spreadsheets containing the 10 re-classified assessments, including North Fork Whychus Creek, and a spreadsheet with the evaluation of the sample organism counts. The sheet called "w records" has the analysis of the samples relative to the assessment records, and notes which records should have been changed and/or delisted.

Thanks.

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